

**UNITED STATES BANKRUPTCY COURT
MIDDLE DISTRICT OF PENNSYLVANIA**

In re: Debtor(s) name(s) used by the debtor(s) in the last 8 years, including married, maiden, and trade):

Roberta Lyn Hoy
Debtor 1

CAB East, LLC by Ford Motor Credit Company, LLC
Movant(s)

v.

Roberta Lyn Hoy

Respondent(s)

Jack N. Zaharopoulos, Esquire
Standing Chapter 13 Trustee

Additional Respondent

Chapter 13

Case No. 1:19-BK-05263-HWV

Matter: Motion for Relief from the Automatic Stay

Document No. 30

**DEBTOR(S)' ANSWER TO MOVANT(S)' MOTION
FOR RELIEF FROM THE AUTOMATIC STAY**

AND NOW, come the Debtor(s), Roberta Lyn Hoy, through their attorney, Paul D. Murphy-Ahles, Esquire and DETHLEFS PYKOSH & MURPHY, who files the within Debtor(s)' Answer to Movant(s)' Motion for Relief from the Automatic Stay and aver as follows:

1. Admitted.
2. Admitted.
3. Admitted.
4. Admitted
5. Admitted.
6. Denied. Debtor(s) have maintained insurance on the vehicle as required by the Lease.
7. Paragraph 7 contains a conclusion of law to which no response is required.
8. Denied. Debtor(s) are without sufficient knowledge as to the truth of the averment as stated in Paragraph

8; therefore, it is denied.

9. Admitted.

10. Admitted.

11. Admitted. By way of further response, Debtor(s) stand ready to bring their account current per stipulation

terms agreeable to the parties.

12. Admitted in part, denied in part. It is admitted that Debtor(s) have defaulted on the lease, and Debtor(s) stand ready to bring their account current per stipulation terms agreeable the parties. It is denied that Movant(s) have incurred fees and costs incurred with the filing of the Motion; therefore, they are denied.

WHEREFORE, Debtor(s) requests this Court deny the requested relief.

Respectfully submitted,
DETHLEFS PYKOSH & MURPHY

Date: October 4, 2021

/s/ Paul D. Murphy-Ahles

Paul D. Murphy-Ahles, Esquire
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Attorney for Debtor(s)

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CERTIFICATE OF SERVICE

I hereby certify that on Monday, October 4, 2021, I served a true and correct copy of the **Debtor(s)' Answer to Movant(s)'**

Motion for Relief from the Automatic Stay in this proceeding via electronic means upon the following:

Howard Gershman, Esquire
GERSHMAN LAW OFFICES, PC
610 York Road, Suite 200
Jenkintown, PA 19046
Counsel for Movant(s)

Jack H. Zaharopoulos, Esquire
Standing Chapter 13 Trustee
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Hummelstown, PA 17036

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Ronald Reagan Federal Building
228 Walnut Street, Room 1190
Harrisburg, PA 17101

/s/ Kathryn S. Greene

Kathryn S. Greene, RP®, Pa.C.P.
Paralegal for Paul D. Murphy-Ahles, Esquire